

EXHIBIT A

**PROPOSED SCHEDULE FOR CASE-SPECIFIC DISCOVERY
OF REMAINING BELLWETHER CANDIDATES**

Deadline for Written discovery:	November 30, 2015
Completion of Plaintiffs' Depositions:	December 18, 2015
Deadline for Execution of Bellwether Strikes and Joint Filing of Summary of Remaining Cases:	December 23, 2015
Plaintiffs' Expert Reports Due:	January 6, 2016
Defendants' Expert Reports Due:	January 22, 2016
<i>Daubert</i> Motions Due:	February 12, 2016
Close of Case-Specific Fact and Expert Discovery:	February 29, 2016

Responses to written discovery shall be served within 14 days, and documents not withheld based on objections shall be produced within 30 days.